DISCUSSION FIELD TRIP RECORD OF COMMUNICATION Se Galbraith Files Rd Z review Part A. by Pedco. I actually see only one discrepancy in the permit application. Norplex lists 501 of 2000 gal. (36-55 gal drums). Inspection report (IDEQ dated 7/29/81) estimates number of drums as 45 (US 36). Unless we wish to make an issue of 9 drums, we should issue an acknowledgement & conditions of operation, I Pedco Itr - PZ, \$ 4 are unnecessary-If we want Norplex to correct 501 capacity, IP 3 (Pedco Itr.) could be included. Mr Harrington is now "chief" - no longer Acting Chief RCRA RECORDS CENTER conclusions, action taken or required 2 possible actions 1) Issue acknowledgement & conditions of operation 2) Retype letter ommi omitting #2 \$ 4, and request correction of SOI capacity Correct Mr Harrington's title Form 1300-6 (7-72)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 324 EAST ELEVENTH STREET KANSAS CITY, MISSOURI - 64106

Mr. Hal Fenger, Plant Manager Norplex Division, UOP, Inc. P.O. Box 445 Postville, Iowa 52162

EPA ID No. IAD073489288
Facility location: Norplex Div., UOP, Inc.
N.E. County Rd.
Postville, Iowa 52162

Dear Mr. Fenger:

We are conducting a technical review of your Resource Conservation and Recovery Act (RCRA) Hazardous Waste Part A permit application. In order to complete our review we are requesting clarification on several items.

The storage design capacity reported for your containers in Section 3 of your application is inconsistent with the quantities of wastes listed in Section 4. The container (SO1) design capacity is reported as 2000 gallons, however, the estimated annual quantity stored in containers (SO1) is reported as 18,700 gallons assuming 7.5 lb/gal. The design capacity should reflect the total number of gallons that can be properly stored in the hazardous waste container storage area.

You are advised that storage of empty barrels (shown in one of your photographs) is subject to regulation if it does not meet the criteria listed in 40 CFR Section 261.7.

In item X of Form 3510-1 of the permit application, you have entered your EPA I.D. number in the space provided for your RCRA permit number. Please note that your EPA I.D. number is not your permit number and should be removed.

I am enclosing a blank Part A permit application. When submitting a revised permit application, please resubmit in its entirety each item on the application for which changes are requested. In addition, Items I and IX (and Item X if applicable) must be completed. It is not necessary to resubmit information for other items that will not change. Please return the amended Part A permit application form to Mr. Dennis Degner, U.S. Environmental Protection Agency, Region VII, 324 East

Eleventh Street, Kansas City, Missouri 64106, within 30 days of receipt of this letter. Because of the changes noted above, you may want to amend your notification form. A blank notification form is enclosed to assist you in updating your notification data. When submitting a revised notification form, please check the box "subsequent notification" and resubmit in its entirety each item on the notification form. If you have any questions, please contact Mr. Degner at (816) 374-6864.

Sincerely,

U.S. ENVIRONMENTAL PROTECTION AGENCY

Lynn Harrington Acting Chief, Permits Section Waste Management Branch

LH/vss

Enclosure

cc: R. Kolpa (IDEQ)

C. Englebert, Plant Manager

Mr. Hal Fenger, Plant Manager Norplex Division, UOP, Inc. P.O. Box 445 Postville, Iowa 52162

EPA ID No. IAD073489288
Facility location: Norplex Div., UOP, Inc.
N.E. County Rd.
Postville, Iowa 52162

Dear Mr. Fenger:

We are conducting a technical review of your Resource Conservation and Recovery Act (RCRA) Hazardous Waste Part A permit application. In order to complete our review we are requesting clarification on several items.

The storage design capacity reported for your containers in Section 3 of your application is inconsistent with the quantities of wastes listed in Section 4. The container (SO1) design capacity is reported as 2000 gallons, however, the estimated annual quantity stored in containers (SO1) is reported as 18,700 gallons assuming 7.5 lb/gal. The design capacity should reflect the total number of gallons that can be properly stored in the hazardous waste container storage area.

You are advised that storage of empty barrels (shown in one of your photographs) is subject to regulation if it does not meet the criteria listed in 40 CFR Section 261.7.

In item X of Form 3510-1 of the permit application, you have entered your EPA I.D. number in the space provided for your RCRA permit number. Please note that your EPA I.D. number is not your permit number and should be removed.

I am enclosing a blank Part A permit application. When submitting a revised permit application, please resubmit in its entirety each item on the application for which changes are requested. In addition, Items I and IX (and Item X if applicable) must be completed. It is not necessary to resubmit information for other items that will not change. Please return the amended Part A permit application form to Mr. Dennis Degner, U.S. Environmental Protection Agency, Region VII, 324 East

Eleventh Street, Kansas City, Missouri 64106, within 30 days of receipt of this letter. Because of the changes noted above, you may want to amend your notification form. A blank notification form is enclosed to assist you in updating your notification data. When submitting a revised notification form, please check the box "subsequent notification" and resubmit in its entirety each item on the notification form. If you have any questions, please contact Mr. Degner at (816) 374-6864.

Sincerely,

U.S. ENVIRONMENTAL PROTECTION AGENCY

Lynn Harrington Acting Chief, Permits Section Waste Management Branch

LH/vss

Enclosure

cc: R. Kolpa (IDEQ)

C. Englebert, Plant Manager

Mr. Hal Fenger, Plant Manager Norplex Division, UOP, Inc. P.O. Box 445 Postville, Iowa 52162

EPA ID No. IAD073489288
Facility location: Norplex Div., UOP, Inc.
N.E. County Rd.
Postville, Iowa 52162

Dear Mr. Fenger:

We are conducting a technical review of your Resource Conservation and Recovery Act (RCRA) Hazardous Waste Part A permit application. In order to complete our review we are requesting clarification on several items.

The storage design capacity reported for your containers in Section 3 of your application is inconsistent with the quantities of wastes listed in Section 4. The container (SO1) design capacity is reported as 2000 gallons, however, the estimated annual quantity stored in containers (SO1) is reported as 18,700 gallons assuming 7.5 lb/gal. The design capacity should reflect the total number of gallons that can be properly stored in the hazardous waste container storage area.

You are advised that storage of empty barrels (shown in one of your photographs) is subject to regulation if it does not meet the criteria listed in 40 CFR Section 261.7.

In item X of Form 3510-1 of the permit application, you have entered your EPA I.D. number in the space provided for your RCRA permit number. Please note that your EPA I.D. number is not your permit number and should be removed.

I am enclosing a blank Part A permit application. When submitting a revised permit application, please resubmit in its entirety each item on the application for which changes are requested. In addition, Items I and IX (and Item X if applicable) must be completed. It is not necessary to resubmit information for other items that will not change. Please return the amended Part A permit application form to Mr. Dennis Degner, U.S. Environmental Protection Agency, Region VII, 324 East

CONCURRENCES								
SYMBOL	PMTS	PMTS	PMTS					
SURNAME	Degner	Harrington	Morby		************		****************	
DATE				*************	***************************************	*************	•	• • • • • • • • • • • • • • • • • • • •
EPA Form	1320-1 (12-70)						OFFICI	AL FILE COPY

Eleventh Street, Kansas City, Missouri 64106, within 30 days of receipt of this letter. Because of the changes noted above, you may want to amend your notification form. A blank notification form is enclosed to assist you in updating your notification data. When submitting a revised notification form, please check the box "subsequent notification" and resubmit in its entirety each item on the notification form. If you have any questions, please contact Mr. Degner at (816) 374-6864.

Sincerely,

U.S. ENVIRONMENTAL PROTECTION AGENCY

Lynn Harrington Acting Chief, Permits Section Waste Management Branch

LH/vss

Enclosure

cc: R. Kolpa (IDEQ)

C. Englebert, Plant Manager

bcc: PEDCo

M. Sanderson (AWCM)



